

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

JOSEPH H. KORAN, and KIMBERLY )  
KORAN, Individually and on Behalf of )  
ANA KORAN, JOSEPH KORAN, JR. )  
and ERIK KORAN, Minors, )  
Plaintiffs )

**C. A. No. 05-11454-RGS**

v. )

ELIZABETH WEAVER, and )  
TOWN OF SHERBORN, )  
Defendants )

**PLAINTIFF'S OPPOSITION TO DEFENDANT  
TOWN OF SHERBORN'S MOTION TO COMPEL**

Plaintiff Joseph H. Koran opposes Defendant Town of Sherborn's Motion to Compel.

In support, plaintiff states as follows:

1. Because of the nature of plaintiff's work, he has moved several times in the years since the accident. Plaintiff believes that his tax records were lost during one of those moves. He has requested copies of the missing records from the Internal Revenue Service, and will produce the years 2004 - 2006 presently, and the remainder upon receipt.
2. Plaintiff has provided to defendant the names of the following physicians or medical service providers, and executed releases for their records:
  - A. Pharmacy Records
  - B. Kinney Drugs and Medicine Plus Phar (Eckerd Store #5836)
  - C. Robert Samaan, M.D. (PCP)
  - D. Dr. Diaz (Care Best Internal Med.)
  - E. Sergio Zappala, P.T. (Aquatic Centers)

- F. Robert Tiso, M.D. (NY Pain Center)
- G. St. Joseph's Hospital and Health Center
- H. Harvey A. Sauer, M.D. Urology Consultants of Syracuse
- I. MDR North Medical Center (MRI L-Spine)
- J. Clyde Satterly, M.D. (Lakeshore Family Medicine)
- K. Capital Area Pain Mgmt. Associates
- L. Drs. Gonchigar, Sherlekar, Shauri and Okezie
- M. North Medical Urgent Care
- N. NY Heart Center
- O. University Hospital
- P. Dr. Huckell (Pinnacle Ortho.)
- Q. Dr. McMullen
- R. Frederick Primary Care Assoc.
- S. Dr. Hakim

3. Plaintiff has made a good faith effort to provide all information available to him regarding the health care which he received in several states over an extended period of time. He believes that the names of some doctors listed by the defendant were found in medical records, and may have provided medical services to him indirectly, so that plaintiff does not know them, and has no more information about them than the defendant does.
4. The records requested which relate to plaintiff's wife, such as her therapy records, are no longer relevant, since her claim has been dismissed.
5. The plaintiff will move promptly to comply with any order of the Court regarding discovery which is within his power to obey.

By his Attorney,

s/ Carmen L. Durso  
CARMEN L. DURSO, ESQUIRE  
B.B.O. # 139340  
175 Federal Street, Suite 1425  
Boston, MA 02110-2287  
617-728-9123  
May 3, 2007

**CERTIFICATE OF SERVICE**

I hereby certify that a true copy of the above document was served upon the attorney of record for each party by mail and FAX, on May 3, 2007.

s/ Carmen L. Durso  
CARMEN L. DURSO